

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

TRAXCELL TECHNOLOGIES, LLC,

Plaintiff,

v.

HELBIZ, INC.,

Defendant

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 9/21/23

Civil Action No. 22-cv- 1:22-cv-08128

JURY TRIAL DEMANDED

MEMO ENDORSED

9/21/23  
All proceedings in this action are stayed.  
In the face of the automatic stay, the court  
lacks authority to  
rule on the pending motions. All  
pending motions are placed on the court's  
suspense docket.  
Counsel for Plaintiff shall  
update the court every 120 days  
as to the status of the  
Traxcell bankruptcy  
and shall advise  
the court if and when  
there comes a time at  
which the  
court can  
adjudicate  
the pending  
motions.

**NOTICE OF SUGGESTION ON PENDENCY OF BANKRUPTCY FOR TRAXCELL  
TECHNOLOGIES, LLC AND AUTOMATIC STAY OF PROCEEDINGS**

**PLEASE TAKE NOTICE** that, on September 19, 2023, Traxcell Technologies, LLC (the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Western District of Texas (the "Bankruptcy Court"). The Debtor's chapter 11 case is pending before the Honorable Shad M. Robinson, United States Bankruptcy Judge, and is being administered under the case *In re: Traxcell Technologies, LLC*, Case No. 23-10771 (the "Chapter 11 Case"). A copy of the voluntary petition of the Debtor, Traxcell Technologies, LLC, is attached hereto as **Exhibit A**. The voluntary petition was filed by Traxcell's attorney, Charles R. Chesnutt, Charles R. Chesnutt, P.C. 2608 Hibernia Street, Office 107, Dallas, TX 75204, 972-248-7000.

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 362(a) of the Bankruptcy Code, the Debtor's filing of their respective voluntary petitions gives rise to a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtor (i) that was or could have been commenced before the commencement of the Chapter 11 Cases or (ii) to recover a claim against the Debtor that arose before the commencement of the Chapter 11 Cases;

Colleen M. Hill

(b) the enforcement, against any of the Debtor or against any property of each of the Debtor's bankruptcy estates, of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtor's bankruptcy estates, or to exercise control over property of any of the Debtor's bankruptcy estates.<sup>1</sup> No order has been entered in the Chapter 11 Cases granting relief from the automatic stay with respect to the above-captioned cases.

**PLEASE TAKE FURTHER NOTICE** that pleadings filed in the Chapter 11 Cases may be obtained by visiting the Court's website at <http://www.txs.uscourts.gov/> (PACER login and password required) in accordance with the procedures and fees set forth therein. Additionally, if you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.txwb.uscourts.gov> or at the Clerk's Office, 903 SAN JACINTO, SUITE 322, AUSTIN, TX 78701.

Respectfully submitted,

**Ramey LLP**

/s/ David J. Hoffman

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<sup>1</sup> Nothing herein shall constitute a waiver of the Debtor's rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned cases. The Debtor expressly reserve all rights to contest any claims that may be asserted against the Debtor.

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*Attorneys for Traxcell Technologies, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of September 20, 2023, with a copy of the foregoing via e-mail.

/s/ William P. Ramey, III  
William P. Ramey, III